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April 28, 2016

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90
Range Wyoming Challenge to A-CAM V. 2.2 Competitive Coverage Areas**

Dear Ms. Dortch:

The Range Corporation in Wyoming - Range Telephone Cooperative (SAC 512251) and Dubois Telephone Exchange (SAC 512291) (jointly, "Range Wyoming" or "Range") - hereby files this challenge to competitive coverage area contained in Alternative Connect America Cost Model ("A-CAM") version 2.2 pursuant to the streamlined challenge process established by Public Notice (DA 16-378, WC Docket No. 10-90, Public Notice Apr. 7, 2016).

The enclosed Excel document contains the census blocks being challenged, the name of the carrier the FCC determined has competitive service in the area, and the reason for the challenge. The challenges fall into to two main types.

First, there are a number of census blocks for which the FCC has determined that there is a competitor, when, in fact, the entity that provided that 477 data for the census block is an ILEC in a neighboring exchange of ours that happens to share the same census block. This is the split census block scenario discussed in the *ex parte* letter filed in this docket by NTCA on April 25, 2016 with respect to a telephone conversation with Wireline Competition Bureau staff on April 21, 2016, about how the A-CAM treats neighboring ILECs in a shared census block as competitors even when those ILECs operate in distinct parts of that census block and there is, in fact, no geographic overlap between them. The rationale for the challenge in the enclosed document for these census blocks is listed as "Exchange Boundary Splits Census Block." Because the neighboring ILEC is not providing service in Range's exchanges, we respectfully request the model be fixed for those areas.

Second, there are a number of census blocks for which we have determined that the competitor is not providing the required services for the census block to be deemed competitively served. For two of them, we performed a field evaluation and determined that the carrier does not have any facilities in the census blocks. For the others we verified directly with the provider that they are not providing the required services. Enclosed is a separate document that contains information about whom we talked to

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on what date, their contact information, and the required services that aren't provided. If the Commission would like further information from any those providers confirming they don't have facilities or provide the required services in the census blocks listed, we can attempt to obtain affidavits to that affect.

For the reasons set forth above and supported in the enclosed documents, we respectfully request that the census blocks be removed from the competitive coverage area for Range and be deemed eligible for A-CAM support.

Should you have any questions about this filing, or desire additional information, please contact me at 307-347-7010 or jhendricks@rtcom.net.

Sincerely,

A handwritten signature in black ink, appearing to read "J. P. Hendricks", with a long horizontal flourish extending to the right.

Jason P. Hendricks
Chief Regulatory Officer